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MARK MASTERS*

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

| | | |
|-------------------------------------|---|-------------------------------|
| ASTERO, LLC, et al., |) | Case No. 1:13-cv-06005-NLH-JS |
| |) | |
| Plaintiffs, |) | |
| |) | NOTICE OF MOTION |
| |) | TO VACATE |
| v. |) | ENTRY OF DEFAULT |
| |) | |
| TALK RADIO NETWORK |) | |
| ENTERTAINMENT, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

PLEASE TAKE NOTICE that on March 17, 2014, or as soon thereafter as the Court desires, Defendants TALK RADIO NETWORK ENTERTAINMENT, INC. and MARK MASTERS shall move before the Honorable Joel Schneider, United States District Judge, sitting in the United States District Court for the District of New Jersey in Newark, New Jersey, for an order vacating the entry of default against Defendants in this action.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Defendants shall rely on the Brief in Support submitted simultaneously herewith. A

proposed Order has been herewith submitted.

Dated: 2/19/14

Respectfully submitted,
TSIMPEDES LAW FIRM

/s/ Athan T. Tsimpedes

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2014, I filed electronically the foregoing notice of motion, together with the motion to vacate and brief in support using the Court's CM/ECF system, which will send an electronic notification of filing to all counsel of record who have obtained CM/ECF passwords.

/s/ Athan T. Tsimpedes

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